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NAS WHITING FIELD
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LETTER REGARDING U S EPA REGION IV COMMENTS ON SITE 15 DRAFT RECORD OF
DECISION NAS WHITING FIELD FL
8/23/2006
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET, SW
ATLANTA, GEORGIA 30303-8960

August 23, 2006

4WD-FFB

Commanding Officer
ATTN: Sarah Reed
Naval Facilities Engineering Command Southern Division
P.O. Box 190010
North Charleston SC 29419-9010

SUBJECT: NAS Whiting Field, Florida
EPA ID# FL2170023244

Dear Ms. Reed:

The United States Environmental Protection Agency (EPA) has received (electronically) and reviewed the following document:

- **Record of Decision for Surface and Subsurface Soils at Site 15, Southwest Landfill, Rev. 0, June 2006, NAS Whiting Field, Milton, FL (Tetra Tech NUS, Inc.).**

Enclosed are EPA's review comments. If you should have any questions, please contact me at (404) 562-8555.

Sincerely,

A handwritten signature in black ink, reading "Craig A. Benedikt". The signature is fluid and cursive, with the first name "Craig" being more prominent.

Craig A. Benedikt
Senior Remedial Project Manager
Federal Facilities Branch

Enclosure

cc: James Cason, FDEP

**EPA Review Comments
Record of Decision
Site 15, Southwest Landfill
Rev. 0
NAS Whiting Field, Milton, FL
June 2006**

1. **Title Page:** Please include the operable unit (OU) number on the title page.
2. **Section 1.1, Page 1-1:** Change “town” to “city” in the first sentence of this section. Change “Site 15” to “OU 14 – Site 15” at the beginning of the second sentence.
3. **Section 1.2, Page 1-1:** Revise the first sentence of the section as follows: “This decision document presents the selected remedy for OU 14 – Site 15 as Land Use Controls (LUCs) for surface and subsurface soils.” Please add the following after the second sentence: “There is no surface water or sediment present at Site 15.”
4. **Section 1.3, Page 1-1:** Please identify the land use assumed when identifying constituents of concern.
5. **Figure 1-1, Page 1-2:** Please correct the scale of the two figures on this page.
6. **Section 1.3, Page 1-3:** Please revise the first sentence at the top of the page as follows: “The ecological risk assessment (ERA) presented in the RI did not identify any unacceptable ecological risks at Site 15; therefore, further ecological study is unwarranted.” In the second sentence, delete “the potential”. Include the standard statement that the response action taken is necessary to protect human health and the environment. See ROD guidance at page 6-3, Highlight 6-3.
7. **Section 1.4, Page 1-3:** Please state that no surface water or sediment is present at Site 15 at the end of the second paragraph. In the last sentence of the third paragraph, the term “complete closure” should be further explained or deleted from the paragraph. A third bulleted item should be added to include a prohibition against digging.
8. **Section 1.4, Page 1-4:** In the third sentence of the seventh paragraph, delete “and groundwater” and add “unlimited” between “and” and “exposure”. Please add the word “maintaining” between “implementing” and “reporting on” in the last sentence of the seventh paragraph.
9. **Section 1.5, Page 1-4:** Address whether the remedy satisfies the following statutory requirements: 1) utilization of permanent solutions and alternative treatment technologies or resource recovery technologies; 2) satisfy the preference for treatment as a principal element of the remedy. See ROD guidance at page 6-4 and the Highlight 6-4.
10. **Section 1.7, Page 1-5:** Please change the EPA authorizing signature information to the following: Beverly H. Banister, Acting Director, Waste Management Division, U.S. EPA Region 4. The authorizing signature page should be a separate page.
11. **Section 2.1, Page 2-1:** Delete the word “at” in the second sentence of the first paragraph.
12. **Section 2.2.1, Page 2-1:** Identify the lead agency and support agency. Revise the term “hazardous waste” to read “hazardous substances” or “hazardous constituents.” The waste disposal periods predated RCRA

13. **Section 2.2.2, Page 2-3:** The sixth sentence of the second full paragraph on this page mentions a removal action which took place at the site. Additional information should be provided regarding why the removal was necessary, the chemical constituent(s) and concentrations to be addressed by the removal action. A reference should also be provided for the removal completion report.
14. **Section 2.3, Page 2-4:** Please correct the dates highlighted in yellow in the first, second, and third paragraphs.
15. **Section 2.4, Page 2-4:** Please add the following sentence to the end of the first paragraph: "There is no surface water or sediment present at Site 15."
16. **Table 2-1, Page 2-5:** Please correct the date highlighted in yellow.
17. **Section 2.5, Page 2-6:** Provide more information describing the site characteristics, including surface and subsurface features, geographic or topographic features which may impact the remedy selection. Describe the sampling strategy used. Include more detailed information about constituents detected and their concentrations. Reference to the Remedial Investigation is not enough. Please see Section 6.3.5 of the ROD guidance which details the type of information required for inclusion in the ROD.
18. **Section 2.5.1.2, Page 2-6:** The third sentence of the first paragraph states that two COPCs were identified following the risk assessment. Constituents are identified as COPCs prior to conducting the risk assessment. Following the risk assessment, any constituent identified as having risk associated with it is considered a COC. Please revise.
19. **Section 2.5.1.2, Page 2-7:** The first paragraph of this section identifies two COPCs, Aroclor-1242 and mercury; however, the second paragraph only addresses Aroclor-1242. Additional information should be provided to address mercury.
20. **Section 2.5.3, Page 2-7:** The third paragraph of this section suggests humans and ecological receptors are effective at moving soil, and then goes on to only discuss human activity. This paragraph should also address the effect of ecological receptors.
21. **Section 2.5.4, Page 2-8:** Clarify what is meant by "non-residential/recreational" land use. Please revise here and throughout the ROD using the land use terms used in the preamble to the NCP at 55 FR 8710, March 8, 1990 (residential, industrial, recreation).
22. **Section 2.6, Page 2-8:** In the third sentence of the first paragraph, change the word "site" to "onsite". Include a section briefly describing the meaning of the risk numbers.
23. **Section 2.6.1, Page 2-8:** Provide a regulatory reference for the FDEP target levels and EPA and State of Florida risk benchmarks.
24. **Section 2.6.1.1, Page 2-9:** The discussion of "Carcinogenic Risk" only states that Aroclor-1242 exceeded the FDEP target level of 1×10^{-6} ; however, this section should identify the exact level of risk associated with Aroclor-1242. The last sentence of the second paragraph should be revised as follows: "Risk estimates for mercury did not exceed USEPA or State of Florida risk benchmarks for any of the receptors evaluated."
25. **Section 2.6.3, Page 2-10:** The second paragraph of this section should identify the exact level of risk associated with Aroclor-1242. Currently, the text only states that Aroclor-1242 exceeded State of Florida risk benchmarks.
26. The ROD must include a description of the alternatives considered and then contrast those remedies using the nine criteria specified in the NCP. See Section 6.3.9 of the ROD guidance.

27. **Section 2.7.1, Page 2-11:** The first sentence of the second bulleted item should be revised as follows: “No unacceptable ecological risks were identified.”
28. **Section 2.7.2, Page 2-11:** In the first sentence of the first paragraph, change the word “reuse” to “use” and add “and unlimited exposure;”. The first bulleted item in the “LUC performance objectives” should be revised to be more site specific. As written, it is too general. The second bulleted item should list any other prohibited uses of the site such as daycares, schools, parks, etc.
29. **Figure 2-2, Page 2-12:** The exact LUC boundary is difficult to discern in this figure. Please use something other than a dashed line to identify the LUC boundary as a dashed line is already used to denote other features of the site.
30. **Section 2.7.2, Page 2-13:** Delete the reference to “future” remedial actions. Any change in the remedy will require review and reopening of the ROD. The first bulleted item on this page should include a listing of allowable uses of the site under a non-residential/recreational use scenario such as schools, daycares, parks, etc. In addition, a second bulleted item should be added to include a prohibition against digging into the landfill and removing soil from the site. In the third sentence of the first full paragraph, change the word “reuse” to “use”. In the fourth sentence, add “maintaining” in between “implementing” and “inspecting”.
31. **Table 2-2, Page 2-14:** Add a 5-year review requirement to the description of “Operation and Maintenance Costs”.
32. **Table 2-3, Page 2-16:** ARARS must be correlated with the remedy considered. A generic table of ARARS is not enough. Please revise the ROD to address this comment.
33. Remedies which leave waste in place must include 5-year reviews, per CERCA Section 121(c). Please revise the ROD as necessary to address this comment.
34. **Responsiveness Summary:** Please change the dates highlighted in yellow.